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March 15, 2006

Mr. Steve Maybury
New Jersey Department of Environmental Protection
Site Remediation & Waste Management
Division of Remediation Management and Response
Bureau of Northern Case Management
401 East State Street, 5th Floor
Trenton, New Jersey 08625-0028

Subject: **Response Plan**

Reference: **Edgewood Property Site – 465 Route 70 West, Township of Brick, Ocean County, NJ**

Dear Steve:

On behalf of Ford Motor Company, Tetra Tech is submitting the attached Response Plan for the removal of crushed concrete material from the Edgewood site located at 465 Route 70 West in Brick, New Jersey. This plan incorporates the specific requirements as outlined in the NJDEP Administrative Order issued to Ford Motor Company (Ford) on March 8, 2006 (EA ID #: PI V1166).

All information in this Plan concerning the crushed concrete on the 465 Route 70 West Property, including the origin of that crushed concrete, was obtained from EPI and/or from discussions with its employees, agents, and contractors. Other than sample data obtained by Tetra Tech or visual data collected by Tetra Tech employees, Tetra Tech has relied on this information in drafting this Response Plan.

This plan details the removal and disposal of crushed concrete material currently located on the Route 70 West property that was reportedly transported from the former Ford Edison Assembly Plant property located at 939 U.S. Highway Route 1 in Edison, New Jersey by Edgewood Properties Inc. (EPI). This Response Plan addresses the following major elements:

1. Identify and remove material, and dispose material at an approved disposal facility.

2. Implement and maintain dust control measures including air monitoring.

3. Provide disposal tracking logs and documentation for the crushed concrete materials removed from the Route 70 West property.

4. Collect and analyze "post-excavation" samples from the soil located below the removed material to insure that no material is left at the site.

5. Submit progress reports to the NJDEP.

Ford intends to dispose of these materials at the following permitted facility: MCUA Middlesex County Landfill in East Brunswick, New Jersey. If necessary to meet the timing set forth in this Plan, Ford also proposes to use BFI Conestoga Landfill in Morgantown, Pennsylvania. The sampling will be performed in accordance with the NJDEP Technical Requirements for Site Remediation.

Current Summary

The property is located at 465 Route 70 West in the Township of Brick, Ocean County, NJ and is comprised of two separate parcels. The site is currently under development as commercial retail space. According to Edgewood Properties, approximately 26 truck loads (350 cubic yards) of crushed concrete material from the former Edison Ford Assembly Plant were delivered to the site in June 2005. The crushed concrete was reportedly utilized at two locations on this site:

Location # 1- Approximately 24 truck loads of the crushed concrete was constructed into an access road to accommodate truck traffic on the western parcel of the site in an area under construction as a parking lot. The access road has subsequently been capped with approximately 5 feet of cover material as a result of the site development.

Location # 2 - The remaining two loads of crushed concrete were utilized in the construction of an access ramp leading to a storage building on the eastern parcel. The crushed concrete has subsequently been covered with a layer of mason sand to prevent the migration of dust from the property.

Investigation and Delineation Sampling

As previously stated, approximately 24 truck loads of crushed concrete were utilized to construct a truck access road on the eastern parcel of the property and was subsequently capped with 5 feet of cover material. Tetra Tech proposes to conduct test pit excavations and/or soil borings on this parcel to assess the horizontal and vertical extent of the subsurface crushed concrete fill. The test pits and/or soil borings will be advanced until no visual indication of crushed concrete fill is present and the crushed concrete has been fully delineated. Tetra Tech will then collect waste classification samples to meet the needs of the disposal facility.

The estimated 30 cubic yards of crushed concrete used to construct an access ramp will be sampled independently for waste classification analysis. Based upon the previously established sampling frequency of one sample per 500 cubic yards, Tetra Tech will collect one sample of the crushed concrete from the access ramp. Five discrete grab

samples will be collected to form one composite sample as per NJDEP protocol. The sample will be analyzed for the following analytical parameters: Total Petroleum Hydrocarbons (TPHs), Petroleum Aromatic Hydrocarbons (PAHs), Polychlorinated Biphenyls (PCBs), RCRA Characteristics, and Full Toxicity Characteristic Leaching Procedure (TCLP) Parameters. The waste classification samples will be analyzed on an accelerated basis to expedite the removal process.

Removal and Disposal Procedure

Upon completion and review of the waste classification sampling and analysis, the crushed concrete material will be removed by Ford. The material will be transported by a licensed solid waste hauler to MCUA Middlesex County Landfill or BFI Conestoga Landfill. It is anticipated that the crushed concrete material will be transported to the landfill for use as cover material A Tetra Tech site representative will ensure that all shipping manifests, bills of lading or any other required shipping documents have been properly completed for endorsement by Ford or Ford's appointed representative prior to trucks leaving the site. No material will leave the site without prior written approval from the NJDEP.

Ford submits the following two options to address the in-situ material at the 465 Route 70 West site.

1) In-situ Removal Option 1
   All in-situ crushed concrete material will be removed and disposed.

2) In-situ Removal Option 2
   After the limits of the crushed concrete material are defined, the in-situ material would remain on-site if appropriate approvals are obtained. Ford and Edgewood would mutually agree to the final plans if this is to occur. If materials remain in-situ, the parties will comply with the NJDEP Technical Requirements for Site Remediation. Appropriate institutional controls will also be put in place upon NJDEP approval.

Dust Management Plan

All on-site activities will be conducted in a manner to minimize fugitive dust emissions. To accomplish this, the following controls will be implemented:

- All material to be removed from the site will be covered properly to prevent dust migration.
- A water truck and water spray will be used to control dust during removal and loading activities. Additionally, a road sweeper will be used at the site for routine road maintenance to actively control dust emissions.
- A real-time air monitoring program will be implemented before any removal work is performed. This will include monitoring of dust in the exclusion zone, at

the perimeter of the site, and for personnel working in the exclusion zone. Also, a meteorological station will be placed at the site to record information such as daily temperatures, wind speed and direction, etc.

- Prior to trucks departing the site, proper decontamination of the vehicles/equipment will take place. Ford will use a crushed stone truck pad to perform dry decontamination of all trucks prior to their departure form the site. This control will adequately address the concern for crushed concrete material leaving the site.

Ford will immediately cease removal activities at the site if any of the air monitoring action levels or other standards in the attached dust management program is exceeded. In addition, Ford will cease work if the control measures detailed in this Plan or any other provisions of the Administrative Order, regulations or law, are not being met. If this occurs, Ford will not resume work activities until the issues are resolved to the satisfaction of NJDEP.

The specific activities to be conducted for the air monitoring at the site are presented in Attachment 2.

Post Removal Sampling

In accordance with the NJDEP Technical Requirements for Site Remediation, post-excavation samples will be collected from all areas where the crushed concrete material is removed. (Bottom of excavation - 1 sample per 900 square feet; Sidewall – 1 sample for every 30 linear feet of sidewall). The post-excavation samples will be analyzed for PCBs by Severn Trent Laboratories, a NJ certified laboratory. Laboratory analysis will be performed on an accelerated turn-around time of one week (5 working days). After receipt of analytical data, Ford Motor Co. will confirm PCBs above the NJDEP Residential Direct Contact Soil Cleanup Criteria (RDCSCC) do not remain in the areas excavated. If contaminants exceed the RDCSCC in the areas of excavation, additional excavation will occur.

Reporting

As required in the Administrative Order, Ford will provide the following information:

- Progress reports will be submitted to the NJDEP and the designated official from Brick Township on the 1st and 16th of each month of removal activity at the site. The progress report will include a summary of activities conducted and results of air monitoring for the period being summarized.
- A final report will be issued to the NJDEP and Brick Township officials within 14 days after completion of all remedial action activities and receipt of final analytical data. The final report will include a discussion of the procedures taken to eliminate all possible exposure from the material removed and the effectiveness of the procedures implemented to control fugitive dust emissions. The report will also include origin and disposal forms pursuant to Solid Waste Management

regulations that identify all material removed from the site. This information will include the weight of material and equivalent cubic yards.

- Other reports required by the NJDEP or other significant correspondence will be provided to Brick Township.

Schedule

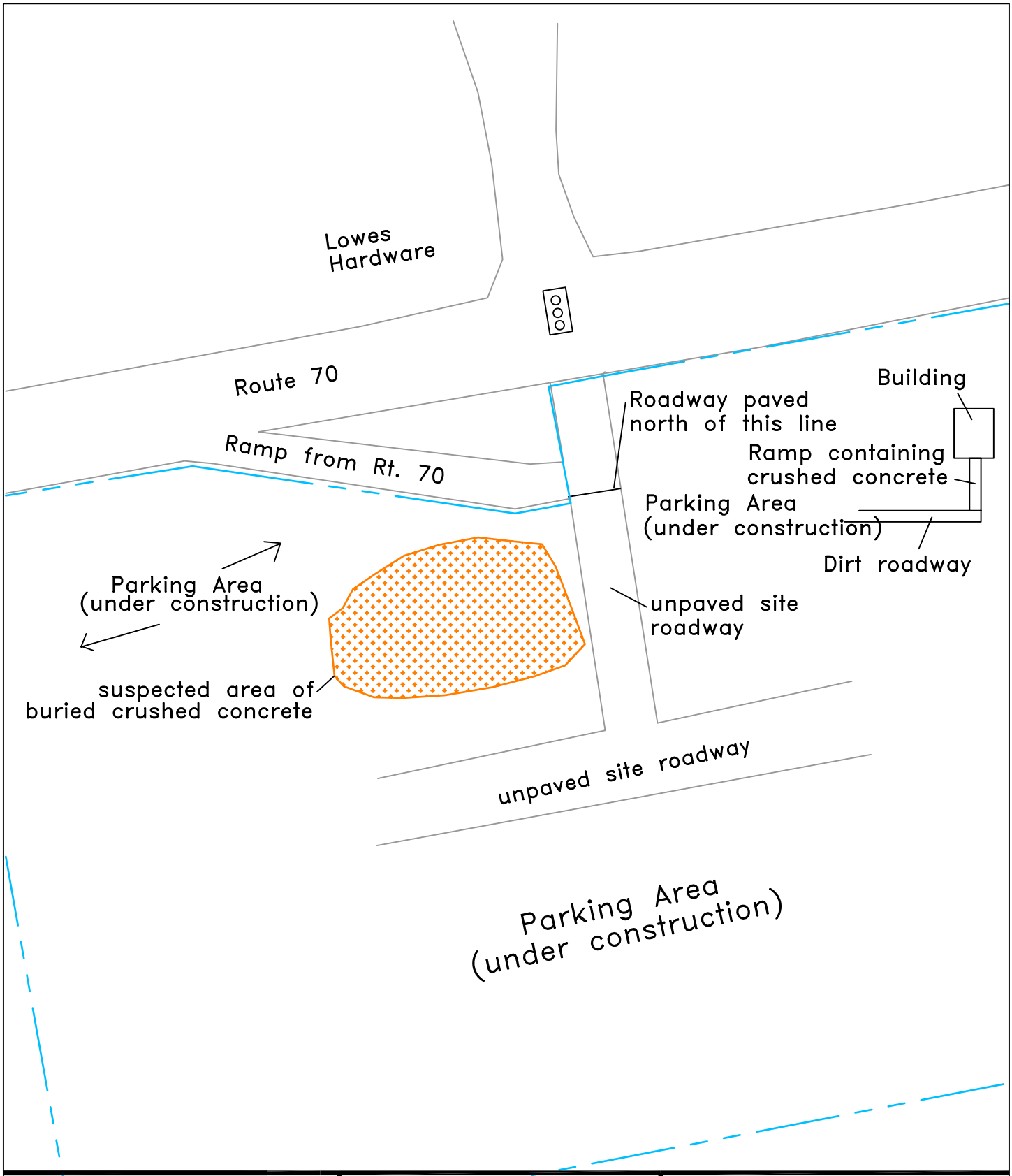
Ford will initiate work for the above referenced activities within 2 days after written approval from the NJDEP. Ford Motor Co. will complete remedial action activities within 30 days after approval of this plan.

Ford Motor Company will notify you prior to the start of any on-site activities and immediately if there are any changes to the schedule. If you have any questions, please contact me at 973-659-9996, extension 231.

Sincerely,

Douglas Sullivan
Senior Project Manager

ATTACHMENT 1
(Site Map)



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LEGEND

Approx. Property Boundary

Suspected Material from the Ford Edison property

SITE ID: Brick Route 70 property
Brick, New Jersey

CLIENT: Ford Motor Company

SCALE	DRAWN BY:	CHECKED BY:
NTS	JB	DS

PLOT DATE: 3/13/2006

SITE MAP

ATTACHMENT 2
(Dust Management Plan)

DUST MONITORING PLAN

EXCLUSION ZONE MONITORING:

Purpose: Evaluate release of dust in zones to determine proper dust control measures.

- Exclusion zone (where work activities will occur) will be established.
- PDR-1000 Dust monitors will be located downwind at the perimeters of the exclusion zones.
- Action levels to implement dust control will be sustained readings (5 minutes) above 5 mg/m^3.
- Visual assessment of dust levels will be used to implement dust control.
- Dust control measures shall be water or dry agents during cold weather and shall be on-site at all times.

PERIMETER MONITORING:

Purpose: To identify and control off-site dust emissions.

- Determine strategic perimeter sampling locations based on wind direction, on-site operations, neighboring properties, public thoroughfares, and NJ DEP concurrence.
- DR-4000 respirable particulate monitors (PM-10) with omni-directional inlets will be used to measure levels of respirable dust at perimeter of the property.
- Action levels to implement dust control or to trigger monitor for specific contaminates of concern (i.e. PCB's) will be sustained readings (15 minutes) above 150 ug/m^3 as identified in the National Ambient Air Quality Standards (NAAQS). (See Attachment A-NAAQS Standards)

PERSONAL MONITORING:

Purpose: Evaluate worker exposure during normal work activities to be able to wear appropriate PPE.

- Determine personnel exposure of worker.
- Monitoring for total dust.
- Use pre-weighed filter cassettes and a low flow pump for dust sampling. (See Attachment B-Sampling Methods)
- Action level to implement upgrade of personal protection equipment (PPE) for dust is 15 mg/m^3.

Based on the low levels of PCB's (Generally 2 ppm) the action level for dust that would trigger PCB concerns and monitoring is estimated at 500 mg/m^{3*}. If this action level is exceeded monitoring for PCB's will require the following:

- Use sorbent tube and low flow pump for PCB sampling. (See Attachment B-Sampling Methods)
- Action level to implement upgrade of personal protection for PCB's is 0.001 mg/m^3 for the National Institute for Occupational Safety and Health (NIOSH) and 1 mg/m^3 for the Occupational Safety and Health Administration (OSHA). Tetra Tech recommends using the NIOSH standard as an action level for upgrading PPE.

Formula to correlate PCB levels in soil to dust levels is:

(Calculation: Convert PCB soil levels to a fraction (2 mg/kg = 0.000002) and multiply by the particulate concentration). For example if the particulate concentration is at 500 mg/m^3 then the concentration of PCB in air is 0.001 mg/m^3, which is the REL.

METEOROLOGICAL STATION:

Purpose: To record weather conditions related to the site.

- Determine location of METSTATION.
- Record daily the temperature, relative humidity, barometric pressure, wind speed and direction.
- Assess this information and correlate with particulate monitoring results.

REPORTING:

Purpose: To ensure communications between all parties.

- Progress reports will be submitted to Ford prior to the 1st and 16th of each month. Ford will issue reports to the NJDEP and municipal officials in accordance with the Administrative Order EA ID #: PI V1166.
- Progress reports will summarize results of the perimeter monitoring and meteorological information during that period.
- Final report will be generated at the end of the project and will include all perimeter monitoring results, meteorological information, and field documentation logs ensuring the effectiveness of the dust management plan. Ford will issue reports to the NJDEP and municipal officials in accordance with the Administrative Order EA ID #: PI V1166.

CONCLUSION:

Monitoring of dust levels will take place prior to removal activities, during removal activities, and after removal activities are complete.

ATTACHMENT A
(NAAQS Standards)

National Ambient Air Quality Standards

POLLUTANT	STANDARD VALUE *		STANDARD TYPE
Carbon Monoxide (CO)			
8-hour Average	9 ppm	(10 mg/m^3)	Primary
1-hour Average	35 ppm	(40 mg/m^3)	Primary
Nitrogen Dioxide (NO_2)			
Annual Arithmetic Mean	0.053 ppm	(100 $\mu g/m^3$)	Primary & Secondary
Ozone (O_3)			
1-hour Average	0.12 ppm	(235 $\mu g/m^3$)	Primary & Secondary
8-hour Average	0.08 ppm	(157 $\mu g/m^3$)	Primary & Secondary
Lead (Pb)			
Quarterly Average	1.5 $\mu g/m^3$		Primary & Secondary
Particulate (PM 10)	*Particles with diameters of 10 micrometers or less*		
Annual Arithmetic Mean	50 $\mu g/m^3$		Primary & Secondary
24-hour Average	150 $\mu g/m^3$		Primary & Secondary
Particulate (PM 2.5)	*Particles with diameters of 2.5 micrometers or less*		
Annual Arithmetic Mean	15 $\mu g/m^3$		Primary & Secondary
24-hour Average	65 $\mu g/m^3$		Primary & Secondary
Sulfur Dioxide (SO_2)			
Annual Arithmetic Mean	0.030 ppm	(80 $\mu g/m^3$)	Primary
24-hour Average	0.14 ppm	(365 $\mu g/m^3$)	Primary
3-hour Average	0.50 ppm	(1300 $\mu g/m^3$)	Secondary

* Parenthetical value is an approximately equivalent concentration.

ATTACHMENT B
(Sampling Methods)

SKC Home
Homeland Security
Contact SKC
Search
Products
Ordering
What's New
Customer Service
Rentals
Downloads
Sales & Service
Email Newsletter
Catalog Request
Sampling Help
Sampling Guides
Laboratories
Links
About SKC
Events / Seminars
Site Map

Guide to OSHA/NIOSH/ASTM Air Sampling Methods

Dust total nuisance

Chemical Hazard: Dust total nuisance

Agency Reference: OSHA CSI

Agency Standards

TWA (ppm): 15 mg/m3

Sample Volume (liter)

TWA: 720

Sampling Rate (ml/min)

TWA: 1500

Sampling Time

TWA (hours): 8

Analytical Method: GR -- Gravimetric Analysis

SKC Equimpent: Filter 225-8-01SC
Filter Cassette and Cyclone Holder 225-1
Filter Cassette 225-2LF

Footnotes: CSI-OSHA Chemical Sampling Information (OSHA CD-ROM

Chemical Hazards by First Letter

SKC Home
Homeland Security
Contact SKC
Search
Products
Ordering
What's New
Customer Service
Rentals
Downloads
Sales & Service
Email Newsletter
Catalog Request
Sampling Help
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Guide to OSHA/NIOSH/ASTM Air Sampling Methods

Polychlorinated biphenyls

Chemical Hazard: Polychlorinated biphenyls

CAS Number: 1336-36-3

Agency Reference: NIOSH 5503

Agency Standards

TWA (ppm): 0.001 mg/m3 (10 hr)

Sample Volume (liter)

TWA: 48

Sampling Rate (ml/min)

TWA: 100 (200)

Sampling Time

TWA (hours): 8 (4)

Analytical Method: GC-ECD -- Gas Chromatography-Electron Capture Detecto

SKC Equimpent: Filter 225-16
Filter Cassette 225-32
Sorbent Tube 226-39

Limit of Detection: 0.03µg/sample

LOD Note: The policies of the AIHA laboratory accreditation committee require that method detection limits must be established and